

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

SHANNON O'BRIEN,)	
)	
Plaintiff,)	
)	
v.)	Case No. 2023 L 11612
)	
FRONTIER AIRLINES, INC., d/b/a)	
FRONTIER AIRLINES.)	
)	
Defendants.)	

**DEFENDANT FRONTIER AIRLINES, INC.'S FIRST SET OF
REQUESTS TO ADMIT TO PLAINTIFF SHANNON O'BRIEN**

NOW COMES the Defendant, FRONTIER AIRLINES, INC., by its attorneys, Hinshaw & Culbertson LLP, and for its Requests to Admit pursuant to Illinois Supreme Court Rule 216, requests that Plaintiff, SHANNON O'BRIEN, admit or deny each and every one of the following requests for admission separately, in writing and under oath, and to serve and file a copy of her answers within 28 days of service as required by Rule 216:

WARNING: If you fail to serve the response required by Rule 216 within 28 days after you are served with this document, all the facts set forth in the requests will be deemed true and all the documents described in the requests will be deemed genuine.

INSTRUCTIONS

1. The requests for admissions are to be answered in accordance with Illinois Supreme Court Rule 216.
2. Each matter of which an admission is requested shall be separately set forth. The matter is admitted unless, within 28 days after service of the request, or within such shorter or longer time as the court may allow, the party to whom the request is directed serves upon the party requesting the admission a written answer or objection addressed to the matter, signed by the party or by the party's attorney.

3. If objection is made, the reasons therefor shall be stated. The answer shall specifically deny the matter or set forth in detail the reasons why the answering party cannot truthfully admit or deny the matter.

4. A denial shall fairly meet the substance of the requested admission, and when good faith requires that a party qualify an answer or deny only a part of the matter of which an admission is requested, the party shall specify so much of it as is true and qualify or deny the remainder.

5. An answering party may not give lack of information or knowledge as a reason for failure to admit or deny unless the party states that he or she has made reasonable inquiry and that the information known or readily obtainable by the party is insufficient to enable the party to admit or deny.

6. A party who considers that a matter of which an admission has been requested presents a genuine issue for trial may not, on that ground alone, object to the request; the party may, subject to the provisions of Illinois Supreme Court Rule 216, deny the matter or set forth reasons why the party cannot admit or deny it.

7. The party who has requested the admissions may move to determine the sufficiency of the answers or objections. Unless the court determines that an objection is justified, it shall order that an answer be served. If the court determines that an answer does not comply with the requirements of this rule, it may order either that the matter is admitted or that an amended answer be served.

8. A request is not objectionable merely because it asks an adversary to admit an opinion about facts or an opinion requiring the application of law to fact.

DEFINITIONS

As used herein, the term(s):

1. “You,” “your,” or “Plaintiff” means Shannon O’Brien or any person acting on her behalf.

2. “Incident” means the events and circumstances which are alleged to have occurred on or about November 16, 2022, aboard Frontier Flight 81 from Punta Cana, Dominican Republic to Chicago, Illinois giving rise to the present cause of action, as further set forth in your Complaint.

REQUESTS FOR ADMISSION TO ADMIT

1. Admit that you are a citizen of the state of Illinois.

RESPONSE:

2. Admit that you are domiciled in the state of Illinois.

RESPONSE:

3. Admit that the amount in controversy in this matter exceeds seventy-five thousand dollars (\$75,000), exclusive of interest and costs.

RESPONSE:

4. Admit that the damages actually sought by you for the injuries alleged in your complaint in this matter exceed seventy-five thousand dollars (\$75,000), exclusive of interest and costs.

RESPONSE:

Dated: December 22, 2023

Respectfully submitted,

HINSHAW & CULBERTSON, LLP

/s/Brian T. Maye
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